

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CommScope, Inc.,)	Civil Action No. 19-cv-15962-
)	MCA-LDW
Plaintiff,)	
)	
v.)	
)	
Rosenberger Technology (Kunshan))	
Co. Ltd., Rosenberger Asia Pacific)	
Electronic Co., Ltd., Rosenberger)	
Technology LLC, Rosenberger USA)	DECLARATION OF ROY LIU
Corp., Rosenberger North America)	IN SUPPORT OF
Pennsauken, Inc., Rosenberger Site)	ROSENBERGER'S
Solutions, LLC, Rosenberger)	MOTION TO SEAL
Hochfrequenztechnik GmbH & Co.)	
KG, Janet Javier, and Robert Cameron,)	
)	
Defendants.)	

I, ROY LIU, hereby declare as follows:

1. I am counsel for Rosenberger Technology (Kunshan) Co. Ltd. ("Rosenberger Kunshan"), Rosenberger Asia Pacific Electronic Co., Ltd. ("Rosenberger Asia Pacific"), and Rosenberger Technology LLC ("Rosenberger Technology") (collectively, "Rosenberger") in the above-captioned matter.

2. I make this Declaration in support of the Motion to Seal in accordance with Local Civil Rules 5.3(c)(3) and 7.2 (the "Motion") in connection with Rosenberger's November 21, 2019 Letter to Honorable Leda Dunn Wettre

Regarding Plaintiff CommScope Inc.'s Request for Emergency Hearing (the "Letter") and Exhibits thereto (the "Exhibits") (ECF No. 75).

3. The documents identified in the Consolidated Index submitted herewith should be maintained under seal on the Court's docket because each contains confidential, proprietary, and non-public information regarding Rosenberger's (the "Movant") business operations or that of its customers. Based upon my own knowledge, public disclosure of this information could cause clearly defined, serious, and unnecessary harm to the Movant or its customers. Specifically, the redacted portions of the Exhibits are narrowly tailored to statements that disclose information contained in discovery materials that have been designated Confidential or Attorneys' Eyes Only by the propounding party. These statements concern confidential information about the Movant's business operations, including confidential and commercially sensitive information about the Movant's base station antenna design and development processes.

4. Plaintiff has contested sealing the Identified Materials as indicated in the Consolidated Index.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 5, 2019.

Roy Liu
Roy Liu